

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DONALD J. TRUMP FOR)	Civil Action
PRESIDENT, INC.; <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	No.: 2-20-CV-966
v.)	
)	
KATHY BOOCKVAR; <i>et al.</i> ,)	
)	
Defendants.)	Judge J. Nicholas Ranjan

DEFENDANT, HUNTINGDON COUNTY'S, MOTION
FOR AN EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' MOTION
FOR A SPEEDY DECLARATORY JUDGMENT HEARING AND EXPEDITED DISCOVERY

Defendant, Huntingdon County Board of Elections, by and through its undersigned counsel, moves this Court for an extension of time to file a response to the Motion for a Speedy Declaratory Judgment Hearing and Expedited Discovery (the "Expedited Motion") and in support thereof avers:

1. On June 29, 2020, Plaintiffs initiated this action against 67 counties and the Secretary of the Pennsylvania Department of State.
2. On July 1, 2020, Plaintiffs filed a Motion for Speedy Declaration Judgment Hearing and Expedited Discovery (the "Expedited Motion").
3. On July 2, 2020, this Court entered an Order requiring Plaintiffs to serve Defendants with the Expedited Motion.
4. The July 2, 2020 Order also required Defendants to file a response to the Expedited Motion by July 13, 2020.

5. On July 6, 2020, Plaintiffs filed a Certificate of Service representing that all Defendants had been served with the Expedited Motion as of that day.

6. Huntingdon received original service of the Complaint and summons on July 8, 2020.

7. Counsel for Huntingdon only entered an appearance on behalf of Huntingdon on July 10, 2020.

8. The rules of court "should be construed, administered and employed by the court and the parties to secure the just, speedy and inexpensive determination of every action and proceeding." Fed. R. Civ. P. 1.

9. A just determination of the Expedited Motion is one that allows Huntingdon sufficient time to secure legal representation and respond to the merits of the Expedited Motion.

10. Counsel for Huntingdon seeks time to familiarize itself with the issues presented in the Expedited Motion so that it can adequately present Huntingdon's position on the Expedited Motion to the Court.

11. Accordingly, Huntingdon respectfully requests the Court grant Huntingdon leave for an extension to file its response to the Expedited Motion until August 3, 2020.

12. Due to the short time frame for filing this Motion, Huntingdon was unable to seek concurrence from Plaintiffs' counsel and/or Defendants' counsel, many of whom do not yet have counsel in this matter and may not have been served with the suit.

WHEREFORE, Defendant, Huntingdon, respectfully requests that this Court grant this Motion and enter an Order extending Huntingdon' deadline to respond to Plaintiffs' Motion for a Speedy Declaratory Judgment Hearing and Expedited Discovery until August 3, 2020.

Respectfully submitted,

GILL, McMANAMON & GHANER

/s/ Peter M. McManamon
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CERTIFICATE OF SERVICE

I, Peter M. McManamon, certify that on July 13, 2020, I served the foregoing document sent automatically by CM/ECF on the following counsel who are registered as CM/ECF filing users who have consented to accepting electronic service through CM/ECF:

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ORDER

AND NOW, this ____ day of July, 2020, after considering Defendant, Huntingdon County Board of Elections', Motion for an Extension of Time to Respond to Plaintiffs' Motion for a Speedy Declaratory Judgment Hearing and Expedited Discovery (the "Motion for Expedited Discovery") and any response thereto, it is hereby ORDERED that Defendant's Motion is GRANTED. Defendant, Huntingdon County Board of Elections, shall respond to Plaintiffs' Motion for Expedited Discovery on or before August 3, 2020.

BY THE COURT:

/_____
J. NICHOLAS RANJAN, J.